

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551 FDS

Hon. F. Dennis Saylor IV

**DECLARATION OF ANNA PORTO IN SUPPORT OF
DEFENDANT'S MOTION TO COMPEL**

I, Anna Porto, declare and state as follows:

1. I am an attorney licensed to practice law in the State of California and admitted to practice before this Court. I am an attorney at the law firm of Kecker, Van Nest and Peters, LLP and counsel for Defendant Google LLC, (“Google”) in the above-captioned action.

2. I submit this declaration in support of Google’s Memorandum of Law in support of its Motion to Compel. I have personal knowledge of the facts stated herein and, if called as a witness, I could testify to them competently under oath.

3. Attached as Exhibit A is a true and correct copy of correspondence from Anna Porto to Singular’s counsel, dated June 22, 2021.

4. Attached as Exhibit B is a true and correct copy of email correspondence from Christopher Sun to Brian Seeve, dated June 28, 2021.

5. Attached as Exhibit C is a true and correct copy of correspondence from Anna Porto to Singular’s counsel, dated June 28, 2021.

6. Attached as Exhibit D is a true and correct copy of email correspondence from Anna Porto to Singular’s counsel, dated July 2, 2021.

7. Attached as Exhibit E is a true and correct copy of Singular’s Responses to Google’s Fourth Set of Interrogatories, dated June 23, 2021.

8. Attached as Exhibit F is a true and correct copy of a document produced in this litigation at SNL-0001469.

9. Attached as Exhibit G is a true and correct copy of Singular’s Objections and Responses to Google’s First Set of Interrogatories, dated August 26, 2020.

10. Attached as Exhibit H is a true and correct copy of Singular’s Infringement Contention Claim Chart, Exhibit A for U.S. Patent 9,218,156.

11. Attached as Exhibit I is a true and correct copy of Singular's Responses to Google's Second Set of Requests For Production, dated June 23, 2021.

12. Attached as Exhibit J is a true and correct copy of Singular's Response to Google's Third Set of Interrogatories and Supplemental Responses to Interrogatory Nos. 15 and 16, dated May 12, 2012.

13. Attached as Exhibit K is a true and correct copy of a document produced in this litigation at SINGULAR-00025012.

14. Attached as Exhibit L is a true and correct copy of a document produced in this litigation at SINGULAR-00006472.

15. Attached as Exhibit M is a true and correct copy of an excerpt of a document produced in this litigation at SINGULAR-00010636..

16. Attached as Exhibit N is a true and correct copy of Singular's Responses to Google's First Set of Request For Production of Documents and Things, dated August 26, 2020.

17. Attached as Exhibit O is a true and correct copy of Singular's Responses to Google's First Set of Requests For Admission, dated June 23, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on July 15, 2021 at San Francisco, California.

/s/ Anna Porto
Anna Porto

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed
Nathan R. Speed